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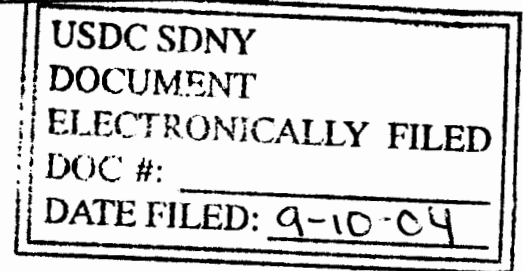
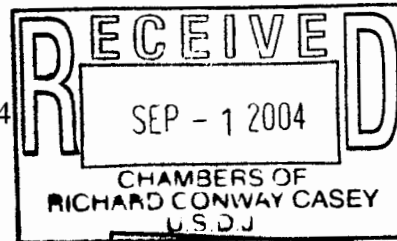
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August 31, 2004

**VIA FEDERAL EXPRESS**

The Honorable Richard C. Casey  
United States District Court for the Southern  
District of New York  
United States Courthouse  
500 Pearl Street, Room 1950  
New York, NY 10007-1312



***In Re: Terrorist Attack on September 11, 2001, MDL No. 1570 (RCC)  
Federal Insurance Company, et al. v. al Qaida, et al., 03 CV 6978 (RCC)***

Dear Judge Casey:

As Your Honor is aware, this firm represents the plaintiffs in *Federal Insurance Co., et al. v. al Qaida, et al.*, 03 CV 06978 (RCC), one of the actions comprising *In Re: Terrorist Attacks of September 11, 2001*, 03 MDL 1570 (RCC). The *Federal* action currently seeks recovery on behalf of 41 member companies of 8 insurance groups, who collectively have paid in excess of \$4 billion in compensation for damages and injuries resulting from the September 11<sup>th</sup> Attack. We recently have been advised that member companies of American International Group (AIG) and ACE Group of Companies (ACE) intend to join as additional plaintiffs in the *Federal* action.

Pursuant to paragraph 12 of Case Management Order No. 2, we will be effecting the joinder of these additional plaintiffs through the filing a supplemental pleading under F.R.C.P. 15(d), on or before September 10, 2004. Consistent with the procedure employed in identifying the claims of the original plaintiffs in the Amended Complaint in *Federal*, we plan to submit schedules for each of the AIG and ACE member companies, identifying the thousands of insureds and workers' compensation claimants to whom those companies have made payments, the relevant policy number for each claim, and other pertinent information.

The Honorable Richard C. Casey  
August 31, 2004  
Page 2

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Under this Court's September 9, 2003 Order, a copy of which is attached hereto, the insurance schedules for the original plaintiffs in *Federal* were filed under seal, in order to protect the identities of the insureds and workers' compensation plaintiffs, many of whom expressed concerns about being publicly identified in this litigation. To respect similar requests by the insureds and workers' compensation claimants of additional plaintiffs AIG and ACE, we are writing to request Your Honor's authorization to file the insurance schedules for those additional plaintiffs under seal as well.

In addition, contemporaneously with the filing of the AIG and ACE schedules, we plan to file revised insurance schedules for the original *Federal* plaintiffs, updating each company's payment information. We also would request Your Honor's authorization to file those updated schedules under seal, again to protect the identities of the individual insureds and workers' compensation plaintiffs.

Obviously, the filing of these schedules under seal would not preclude interested parties from seeking access to the schedules, subject to the terms of an appropriate confidentiality and protective order.

We thank Your Honor in advance for the Court's courtesy and attention to this matter.

Respectfully submitted,

COZEN O'CONNOR



BY: SEAN P. CARTER

SPC/bdw

cc: All Counsel of Record (Via Email or Fax)

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Application granted  
9/9/04  
Richard C. Casey